

Edward Wojciechowski

To: James Hagedorn/R3/USEPA/US@EPA
Subject: Re: TAR DECANTER PITCH TRAPS

04/19/2002 02:39 PM

Jim - Kubiak sent this to me as a result of the questions I asked him. Take a look at it and I will call you early next week. I'll probably be on an inspection all day Monday. wojo

Wojo,

"Downstream heat transfer equipment" refers to the plate and frame heat exchangers at the primary coolers. About 60 GPM (of tar) is recycled from each bank of tar receivers (4 for each tar decanter pitch trap) to the primary coolers for naphthalene absorption. The total tar flow through each tar decanter pitch trap is 100-150 gpm, 60 gpm of which is recycled.

You were right about the effectiveness of a vertical baffle similar to those required for tar decanters. Physical configuration of the conveyor would result in control of less than 10% of the surface area. HOWEVER - keep in mind that the total surface area of each tar decanter pitch trap is only about 3' x 5'. That is much less than the uncontrolled surface area of any tar decanter. We are dealing with a very small source here.

I thought about your statement that the tar decanter pitch traps may meet the definition of a tar storage tank. There is no storage or accumulation occurring in the tar decanter pitch traps. If the outlet were shut off, the unit would overflow within seconds. They are process tanks.

Since they have been in existence since long before the NESHAP rules, they must have been considered for regulation by EPA but, since they are unique to Clairton and Subpart L requires controls on equipment which is generally in use at all byproduct plants, EPA simply is relying on the "in benzene service" control requirement. Since they are not "in benzene service" (and they are very small), they are simply not a significant source of benzene and were never intended to be controlled under Subparts L or V. Only named equipment and other equipment "in benzene service" are required to be controlled..

Call me with any questions. I had a long talk with the people at Clairton that operate this equipment and I have a much better understanding of the process now and I'm even more convinced than before that controls are not required. You and Jim are welcome to come to Clairton to take a look at the equipment.

Bill

Wojciechowski.Edward@epama
il.epa.gov

To: wskubiak@uss.com

cc:

04/17/2002 03:15 PM

Subject: TAR DECANter

PITCH TRAPS

Bill - Just a nudge, so I can get back to Hagedorn. Did you get the opportunity to talk to your people at Clairton works? wojo



"Etzel, Sandra"
<SEtzel@achd.net>
05/30/2002 05:23 PM

To: James Hagedorn/R3/USEPA/US@EPA
cc:
Subject: RE: USX Request for Determination

Thanks for the fax, Jim. You just needed to let me know we were on distribution and the date and I could've looked it up myself. But you did even better, so I thank you.

Was the attached letter your final one? I have no comments to it, but if you would like something from me let me know. Just include me on the distribution, which you would do anyway.

Take care.

Sandy

-----Original Message-----

From: Hagedorn.James@epamail.epa.gov
[mailto:Hagedorn.James@epamail.epa.gov]
Sent: Tuesday, May 28, 2002 1:54 PM
To: setzel@achd.net
Subject: USX Request for Determination

I forwarded the request to Ed Wojciechowski of Region V and he has been working on an answer to the question. See attached file for his current version of the answer. Please comment if needed or desired.
Thank you.

(See attached file: usstraps.wpd)

 Scott Throwe

06/03/2002 11:40 AM

To: James Hagedorn/R3/USEPA/US@EPA

cc:

Subject: Re: USS LETTER 

Jim:

I reviewed the draft memo and agree with Wojo's interpretations.

Scott Throwe

U.S. EPA

Office of Enforcement and Compliance Assurance

Phone: (202) 564-7013

Fax: (202) 564-0050

James Hagedorn

James Hagedorn

05/24/2002 07:35 AM

To: Scott Throwe/DC/USEPA/US@EPA

cc: Dianne McNally/R3/USEPA/US@EPA

Subject: USS LETTER

Please comment on the attached letter which was written by Ed Wojciechowski of R5. He did this work on behalf of R3 as he has dealt with similar steel industry related issues and, as I understand it, has some type of oversight responsibility on steel industry matters, which makes sense as he has been dealing with this industry for a long time as a representative of EPA. I would like to give Ed some feedback ASAP but his logic appears to make sense to me and I thought HQ ought to have some heads up on this letter. Thanks. This is actually an air toxics type issue and I was not sure who to send this to. If you received this in error, please forward to the appropriate person.

----- Forwarded by James Hagedorn/R3/USEPA/US on 05/24/2002 07:27 AM -----

 Edward Wojciechowski

05/22/2002 03:24 PM

To: James Hagedorn/R3/USEPA/US@EPA

cc:

Subject: USS LETTER

Jim - Here is my first cut on the USS letter. Let me know what you think. wojo



usstraps.wp